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October 31, 2023

VIA ECF

Hon. Miroslav Lovric
U.S. Magistrate Judge
U.S. District Court
Northern District of New York
Binghamton U.S. Courthouse
15 Henry St.
Binghamton, NY 13901

Re: *Honeywell Int'l Inc. v. Buckeye Partners, L.P. et al.*, No. 5:18-cv-00646-FJS-ML; *Honeywell Int'l Inc. v. Energy Transfer (R&M), LLC et al.*, No. 5:18-cv-01176-FJS-ML; *Honeywell Int'l Inc. v. CITGO Petroleum Corp.*, No. 5:19-cv-01219-FJS-ML (consolidated)

Dear Judge Lovric,

Pursuant to the Court's July 21, 2023 Text Order, ECF No. 356, all parties to the above-referenced matters conferred and provide the Court with the following status report:

Since our last joint status report filed on July 20, 2023, ECF No. 355, Honeywell, Buckeye Defendants, CITGO, Sunoco Defendants, and Exxon Third-Party Defendants participated in the initial mediation session from October 25, 2023 through October 27, 2023, with mediator Michael Last. The parties have not yet settled the above-captioned cases. Certain parties are continuing their discussions.

With respect to the ongoing discovery efforts, since our last report the parties have continued to work diligently and cooperatively to respond to open discovery items. Atlantic Richfield Company produced 94 documents comprising over 18,000 pages, Exxon produced over 400 documents comprising nearly 4,000 pages, and Honeywell produced over 23,000 documents comprising over 500,000 pages. The parties continue to review the large volumes of documents that have been produced and will propound further discovery requests as needed.



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The parties have also exchanged additional deficiency letters regarding productions; the parties will continue producing documents and completing their responses to the outstanding discovery requests.

All parties consented to my filing this joint status report on their behalf.

Sincerely,

/s/ Tyler L. Burgess

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